



NATIONAL PARKS WALES
Britain's breathing spaces

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National Parks Wales' Response to the Inquiry into Marine Policy in Wales

National Parks Wales is grateful for the opportunity to provide evidence to the Inquiry into the Welsh Government's Marine Policy. The three National Park Authorities (NPAs) in Wales work in partnership as National Parks Wales to collectively respond to policy issues which may potentially influence the management of Wales' National Parks. Colleagues from the Pembrokeshire Coast and Snowdonia National Park Authorities have collaborated on this response, and are content to supply only written input at this time. They are happy for this response to be made public.

Coastal wildlife, coastal scenery and the juxtaposition of clean seas with mountains are the basis of much of Pembrokeshire Coast National Park's and Snowdonia National Park's recreational attraction.

The Pen Llŷn a'r Sarnau Special Area of Conservation (SAC) boundary overlaps virtually all Snowdonia National Park's coastline. The Pembrokeshire Marine SAC, Carmarthen Bay and Estuaries European Marine Sites and the Cardigan Bay SAC overlap around 75% of the National Park's coastline, while Skomer is one of only three Marine Nature Reserves designated in the UK, and the only one in Welsh waters. The islands of Skomer, Skokholm, Grassholm and Ramsey are designated as Special Protection Areas (SPA) and also as National Nature Reserves, and about 80% of the length of the National Park coastline is designated Site of Special Scientific Interest.

Thus, although the Pembrokeshire Coast National Park boundary extends only to the mean low water mark on the mainland and islands, and Snowdonia National Park's boundary to mean high water, the state of the wider marine environment directly and indirectly affects the character and people's enjoyment of what are maritime National Parks. The state of the marine environment is therefore critical to National Park purposes and to the NPAs' socio-economic duty in pursuit of the purposes.



1. What progress has been made in relation to the development of marine spatial plans for Wales?

We understand that the proposals in the 2011 consultation *Sustainable Development for Welsh Seas: Our Approach to Marine Planning in Wales* still reflect Welsh Government's approach, although the inshore and offshore plans will not be completed within the timeframe originally envisaged (i.e. 2013).

While management policy on one side of the foreshore can have significant effects on the other side, the development projects, ecosystem relationships and cultural associations which cross the foreshore boundary are not always reflected in the operational arrangements between the many organisations involved. Cross-boundary planning and partnership working will be essential for landward plans and projects, and the proposed offshore and inshore plans, to mesh successfully.

We suggest that the extended timeframe for preparation of the proposed marine plans should be used to discuss and develop an ecosystems approach (spanning the land/water interface as appropriate) in line with the *Living Wales* proposals, and to build early integration of relevant aspects of this into the workload of the Natural Resources Body for Wales.

The NPAs also support the manifesto for seascapes prepared by Europarc Atlantic Isles and other organisations in 2011¹. This calls on governments, agencies and authorities to recognise, promote and protect coastal character through the marine planning process.

2. What is the current status of marine protected areas in Wales and what role should the new marine conservation zones have in this network of protected areas?

Marine protected areas currently cover 5,834km² (around 37%) of Wales' territorial waters. However, Wales Environment Link notes that more than half of the features of marine Special Areas of Conservation and marine Special Protection Areas are failing to reach favourable conservation status in Welsh waters and in some cases features have deteriorated. Wales Environment Link has noted that "a designation without appropriate management does not constitute protection."²

While Highly Protected Marine Conservation Zones can enhance the existing network of Marine Protected Areas, they will inevitably have only a small collective area, and we calculate that, even if the largest four (the upper limit of eventual sites) of the ten potential sites were to be selected, they would cover a maximum of only 76km² out of almost 16,000km² of Welsh territorial seas - less than 0.5%. The constraint imposed on the number of eventual sites, coupled with their limited area and likely dispersed distribution, will mean that, in themselves, they will only be able to make a limited contribution to the

¹ http://www.europarc-ai.org/wp-content/uploads/2011/11/Seascapes-manifesto_A4.pdf
http://www.europarc-ai.org/wp-content/uploads/2011/11/Seascope-manifesto_welsh_A4.pdf

² Wales Environment Link (2011) 'Policy Briefing: Marine Protected Areas in Wales' <http://www.waleslinkmarine.org.uk/images/user/MPAs.pdf>



UK's marine conservation goals, although we recognise and strongly support the rationale behind their designation (ecosystem protection) and welcome them as an addition to Wales marine protected area network. However, more effective management of the existing suite of Marine Protected Areas must be priority in order to achieve the objective of "clean, healthy, safe, productive and biologically-diverse oceans and seas". Marine Protected Area management should also be pursued on an ecosystem basis, as site features may often be dependent on the state of other sites and on the state of Welsh seas as a whole.

Wales Environment Link's report on *The Use of Voluntary Management in the Protection of UK Marine Biodiversity*³ (2011) evaluates the successes and failures of voluntary approaches to marine conservation using case studies from around the UK, a key finding being that voluntary management cannot be relied on to control damaging activities for sensitive features within marine protected areas. We make further comment on management of marine protected areas under Question 4.

3. The development of the Welsh Government's functions in relation to marine licensing and fisheries and whether this has been effective?

We welcome Welsh Government's streamlined approach to marine licensing and understand anecdotally that the Marine Consents Unit's expertise and processes are highly regarded by users.

We understand that Welsh Government has powers to regulate sea fisheries in Welsh waters through statutory instruments and to license certain marine activities, and has assumed the responsibilities of the Welsh Sea Fisheries Committees. The Wales Marine Fisheries Advisory Group, and the three Inshore Fisheries Groups around Wales, have key roles to play in achieving conservation outcomes and long-term fisheries viability. The Countryside Council for Wales' Marine Science Report No 12/06/01 *MPA Management in Wales 1: Overview of current MPA management in Wales and a summary of new MPA management tools* highlights the new byelaw powers afforded by the Marine and Coastal Access Act 2009. These byelaw powers are applicable to the "prohibition or restriction of exploitation of sea fisheries resources", and in theory enable Welsh Ministers to control all activities seeking to exploit the sea fisheries' resource, whether they occur inside or outside designated site.

We welcome the fact that Wales now has a greater ability to determine the health of fisheries in its waters, especially as commercial fishing appears to be the single biggest factor impacting on the conservation status of European Marine Sites and wider marine ecosystems/biodiversity (i.e. not just in terms of stocks of target fish/shellfish/bait species but in terms of by-catch and damage to marine habitats).

4. What progress has been made by the Welsh Government in the implementation of key European Directives?

³ <http://waleslinkmarine.org.uk/images/user/WEL%20Voluntary%20Marine%20Management%202011.pdf>



Marine protected area management schemes are a key delivery mechanism for nature conservation in the marine environment (although they will on their own be insufficient to deliver the requirements of other directives, including the Marine Strategy Framework Directive). However, many of the key issues affecting European Marine Sites are not solvable at a local level and need to be addressed at a national and/or European level. As far as impacts on the National Parks' special qualities are concerned, the major issues to emerge from the European Marine Sites management schemes are: fisheries management, including exploitation of resources in the intertidal area, offshore and coastal development, management of recreational craft and use of the foreshore, pollution and littering (including commercial and recreational fishing litter).

We conclude that there are at least two critical success factors to helping achieve UK Marine Policy goals for marine ecosystems, and to improving the conservation status of sites and species designated under the Habitats and Birds directives:

- an improved UK/EU policy and associated enforcement framework, especially with regard to intensive and/or damaging fishing effort, and
- better resourcing and management/enforcement control in existing marine protected areas

These two factors require full engagement of all partnership bodies, a lead from Welsh Government, and greater engagement by Welsh Government in delivery, in order to achieve success.

5. Whether there is sufficient cooperation and coordination between the Welsh Government and its neighbouring administrations in relation to the management of its seas?

We do not have evidence to offer in terms of transboundary working at inter-governmental level. However, we endorse the proposal for a Welsh Government-led Wales-wide Marine Protected Area Management Steering Group, described in the Countryside Council for Wales' Marine Science Report No 12/06/03 MPA Management in Wales 2: Evaluation of current MPA management in Wales. Such a group has been identified as a preferred solution to a wide ranging set of challenges to Wales' Marine Protected Area network, and would in our view facilitate cooperation and coordination across national boundaries.

6. Whether the Welsh Government has sufficient financial and staff resource to deliver on its marine policy and legislation objectives?

Our opinion is that the current level of resourcing is insufficient (as evidenced in part by the state of features of European Marine Sites). We suggest that the marine policy and fisheries conservation/enforcement functions of Welsh Government and its agencies will need progressively more resourcing if the goals of the UK Marine Policy Statement and the objectives of the Wales Fisheries Strategy are to be achieved.

Welsh Government may also wish to consider allocating additional, ring-fenced, resources to authorities for action required of them through the management schemes for Wales'



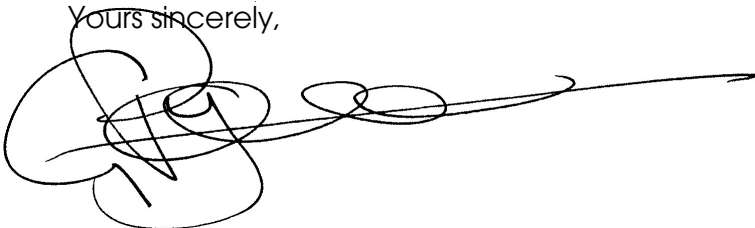
European Marine Sites. Welsh Government may also or alternatively wish to consider making a challenge fund available for European Marine Sites management scheme actions or allocating a specific portion of the Ecosystem Resilience and Diversity Fund to projects indicated by the management schemes.

7. Whether stakeholders have been sufficiently involved in the shaping of new policies and the development of legislation?

Welsh Government has demonstrated a commitment to engaging with stakeholders on a range of plans and processes. We are aware of strong public feeling surrounding the first phase of public consultation on Highly Protected Marine Conservation Zones and this confirms the need for continued early involvement of stakeholders.

Thank you again for the opportunity to comment. If you require any further information or clarification please do not hesitate to contact me in the first instance.

Yours sincerely,



Greg Pycroft
Policy Officer
National Parks Wales

